

05037742

ANNUAL AUDITED REPORT FORM X-17A-5

PART III

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SEC FILE NUMBER

FACING PAGE

Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BE	EGINNING UT.UT.2UU4 AND ENDI MM/DD/YY	MM/DD/YY
	A. REGISTRANT IDENTIFICATION	
NAME OF BROKER-DEALER:	Döding & Partners Brokerage Inc.	OFFICIAL USE ONLY
ADDRESS OF PRINCIPAL PLA	CE OF BUSINESS: (Do not use P.O. Box No.)	FIRM I.D. NO.
Weissdornweg 35		
	(No. and Street)	
Pulheim (City)	Germany (State)	50259 (Zip Code)
	MBER OF PERSON TO CONTACT IN REGARD TO T	HIS REPORT 23815852 (Area Code – Telephone Number
· · · · · · · · · · · · · · · · · · ·	B. ACCOUNTANT IDENTIFICATION	- FOEVED CON
INDEPENDENT PUBLIC ACCC	OUNTANT whose opinion is contained in this Report*	Freq 9, 8 2003
	(Name - if individual, state last, first, middle name)	25/69
Landstrasse 74	Rommerskirchen	4/569
(Address)	(City)	(State) (Zip Code)
CHECK ONE:	· ·	
☑ Certified Public Ac	ccountant	DD00-
☐ Public Accountant		"NUCESSED
☐ Accountant not res	sident in United States or any of its possessions.	PROCESSED MAR 1 7 2005 J
	FOR OFFICIAL USE ONLY	FINANSON
		A CONTRACTAL

*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

SEC 1410 (06-02)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

OATH OR AFFIRMATION

l, Ji	iraer	n Döding , swear (or affirm) that, to the best of
		and belief the accompanying financial statement and supporting schedules pertaining to the firm of
		as of the state of
	2/31	, 2004 are true and correct. I further swear (or affirm) that neither the company nor
any par	ther, pr	oprietor, principal officer or director has any proprietary interest in any account classified solely as
that of a	a custor	mer, except as follows:
		-/- /////
		Signature
		President
		Title
		Notary Public
•		eport** contains (check all applicable boxes):
		Facing page.
	X: (6)	Statement of Financial Condition.
		Statement of Income (Loss). Statement of Cash Flows
		Statement of Changes in Stockholders' Equity or partners' or Sole Proprietor's Capital.
	A (5) (5)	Statement of Changes in Liabilities Subordinated to Claims of Creditors.
	X (2)	Computation of Net Capital.
	N (5)	Computation for Determination of Reserve Requirements Pursuant to Rule 1503-3.
	$\overline{\mathbf{x}}$ (i)	Information Relating to the Possossion or control Requirements Under Rule 15c3-3.
	区 (i)	A Reconciliation, including appropriate explanation, of the Computation of Net Capital Under Rule 15c3-1 and the
	_	Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.
	[] (k)	A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of con-
	8 5. 25	solidation.
		An Oath or Affirmation.) A copy of the SIPC Supplemental Report.
	F (0)	A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit.
		Independent auditor's report on internal control
	<u> </u>	

^{**}For conditions of confidential treatment of certain portions of this filting, see section 240.17a-5(c)(3).

Doding & Partners Brokerage, Inc.

A Reconciliation of the Computation of
Net Capital Under Rule 15 c 3-1 and the
Computation for Determination of the
Reserve Requirements under Exhibit A of
Rule 15 c 3-3 as of December 31, 2004

There were no material differences.

The preceding notes form an integral part of this supplemental information.

FOCUS REPORT

FORM X-17A-5 (Financial and Operational Combined Uniform Single Report)

Part IIA Quarterly 17a-5(a)

INFORMATION REQUIRED OF BROKERS AND DEALERS PURSUANT TO RULE 17

COVER

Select a filing method:		· · · · · · · · · · · · · · · · · · ·	Basi	င	Alternate ([0011]	general Recognition of the Burkey of the Rouge benefits
Name of Broker Dealer:	DODING & PA	ARTNERS BR	OKERAGE, I [0013]			SEC File Number	r: 9 40603
Address of Principal Place of Business:		WEISS	[0019] DORNWEG 35 [0020]			SECTIVE NUMBER	[0014]
	D-50259 PULH	EIM-S [0021] [0022]	D- 50667 (0023)			Firm ID:	23670 [0015]
For Period Beginning 10/03	L/2004 And End [0024]	ding 12/31/	/2004 [0025]		ngangan an gamagagan atmosf		
Name and telephone number	of person to conta	ict in regard to	this report:		de de la decimiente de la composição de la	return organism i program i militar et militar et militar et en	et Marie (t. e. 11.4 m. 11.4 m
Name: JERRY M	. HILL, FINOP [0030]	Phone:	(210) 599-38 (0 0	800 031]			
Name(s) of subsidiaries or affi	liates consolidated	I in this report					
Name:		Phone:					
	[0032]]	[6	0033]			
Name:		Phone:					
	[0034]]	[6	0035]			
Name:		Phone:					
•	[0036]]	[1	0037]			
Name:	[8600]	Phone:	(1	0039]			
Does respondent carry its ow	n customer accour	nts? Yes	- [0040] No	1004	1]	Manuscrience and a comment with the party of	
					-		
Check here if respondent is fi	iing an audited rep	ort	1	[004	2]		

ASSETS

Conso	ilidated C	[0198] Unconsolidate	d • [0199] Allowable	Non-Allowable	Total
1.	Cash	•	[0200]		0 [0750]
2.	Receiva or deale	ables from brokers ers:			
	Α.	Clearance account	5,378 [0295]		
	В.	Other	837 [0300]	[0550]	6,215 [0810]
3.	Receiva custome	bles from non- ers	[0355]	[0600]	⁰ [0830]
4.	Securitie commod market v	es and spot dities owned, at value:			
	Α.	Exempted securities	[0418]		
	В.	Debt securities	[0419]		
	C.	Options	[0420]		
	D.	Other securities	[0424]		
	E.	Spot commodities	[0430]		0 [0850]
5.		es and/or other ents not readily lble:			
	. A.	At cost			
		[0130]			
	В.	At estimated fair value	[0440]	[0610]	0 [0860]
6.	subordir and part and cap	es borrowed under nation agreements tners' individual ital securities s, at market value:	[0460]	[0630]	0 [0880]
	A.	Exempted securities			
		[0150]			
	В.	Other securities			
		[0160]			

7.	Secured demand notes	[0470]	[0640]	[0890]
	market value of collateral:	(0410)	[0040]	[0690]
	A. Exempted securities			
	[0170]			
	B. Other securities			
	[0180]			
8.	Memberships in exchanges:			
	A. Owned, at market			
	[0190]			
	B. Owned, at cost		[0650]	
	C. Contributed for use of the company, at market value		[0660]	[0000]
9.	Investment in and receivables from affiliates, subsidiaries and associated partnerships	[0480]	[0670]	<u>0</u> [0910]
10.	Property, furniture, equipment, leasehold improvements and rights under lease agreements, at cost-net of accumulated depreciation and amortization	[0490]	[0680]	[0920]
11.	Other assets	[0535]	[0735]	0 [0930]
12.	TOTAL ASSETS	6,215 [0540]	ნ [0740]	6,215 (0940)

LIABILITIES AND OWNERSHIP EQUITY

	Liabilities	A.I. Liabilities	Non-A.I. Liabilities	Total
13.	Bank loans payable	[1045]	[1255]	0 [1470]
14.	Payable to brokers or dealers:			
	A. Clearance account	[1114]	[1315]	0 [1560]
	B. Other	[1115]	[1305]	0 [1540]
15.	Payable to non-customers	[1155]	[1355]	0 [1610]
16.	Securities sold not yet purchased, at market value		[1360]	0 [1620]
17.	Accounts payable, accrued liabilities, expenses and other	[1205]	[1385]	0 [1685]
18.	Notes and mortgages payable:			
	A. Unsecured	[1210]		0 [1690]
	B. Secured	[1211]	[1390]	0 [1700]
19.	Liabilities subordinated to claims of general creditors:		X	
	A. Cash borrowings:		[1400]	. 0 [1710]
	1. from outsiders			
	[0970] 2. Includes equity subordination (15c3-1(d)) of			
	{0980}			
	B. Securities borrowings, at market value:		[1410]	0 [1 720]
	from outsiders			
	[0990]			
	C. Pursuant to secured demand note collateral agreements:		[1420]	.0 [1730]
	1. from outsiders			

[1000]

2. Includes equity subordination (15c3-1(d)) of

[1010]

D. Exchange memberships contributed for use of company, at market value		[1430]	0 [1740]
 E. Accounts and other borrowings not qualified for net capital purposes 	[1220]	[1440]	0 [1750]
20. TOTAL LIABLITIES	0 [1230]	0 [1450]	0 [1760]

Ownership Equity

		Total
21.	Sole proprietorship	[1770]
22.	Partnership (limited partners [1020])	[1780]
23.	Corporations:	
	A. Preferred stock	[1791]
	B. Common stock	8,_000 [1792]
	C. Additional paid-in capital	7,000 [1793]
	D. Retained earnings	-8,786 [1794]
	E. Total	<u>6</u> , 214 [1795]
	F. Less capital stock in treasury	[1796]
24.	TOTAL OWNERSHIP EQUITY	€,214 [1800]
25.	TOTAL LIABILITIES AND OWNERSHIP EQUITY	ნ, 214 (1810)

STATEMENT OF INCOME (LOSS)

!	Period Begir	nning 16/01/200 (393)		Period Ending 12/	31/2004 [3933]	Number	of months	3 [3931]
	ENUE	and the second second		T TAX F II MALE HANGIN				
1.	Commissio	ons:						
		Commissions on executed on an e		ons in exchange li	sted equity sec	curities		[3935]
		Commissions on		ion transactions				611 [3938]
	c. A	All other securitie	es commis	ssions				3,486 [3939]
	d. 7	Total securities o	ommissio	ns				4,097 [3940]
2.	Gains or Io	osses on firm secu	ırities tradiı	ng accounts				[50.5]
	a. F	From market mal	king in opt	ions on a national	securities exc	hange		[3945]
	b. F	rom all other tra	ding					[3949]
	c. 7	Total gain (loss)						0 [3950]
3.	Gains or lo	osses on firm secu	irities inves	stment accounts				-10 [3952]
4.	Profit (loss	s) from underwritin	g and selli	ng groups				[3955]
5.	Revenue f	rom sale of invest	ment comp	pany shares				(3970)
6.	Commoditi	ies revenue						[3990]
7.	Fees for a	ccount supervisio	n, investme	ent advisory and ad	ministrative sen	vices	÷	[3975]
8.	Other reve	enue						1,108 [3995]
9.	Total rever	nue						5, 201 [4030]
EXP	ENSES							1,350
10.	Salaries a	nd other employm	ent costs f	or general partners	and voting stoc	kholder off	īcers	[4120]
11.	Other emp	oloyee compensat	ion and be	nefits				[4115]
12.	Commission	ons paid to other t	oroker-deal	lers				2,101 [4140]
13.	interest ex	pense						[4075]
		ncludes interest subordination ag		nts subject to			[4070]	
14.	Regulatory	y fees and expens	es					60 [41 95]
15.	Other expe	enses						1,262 [4100]
16.	Total expe	enses						4,773

NET	INCOME		[4200]		
17.	Net Income(loss) before Federal Income taxes and items below (Item 9 less Item 1	3)	428 [4210]		
18.	8. Provision for Federal Income taxes (for parent only)				
19.	Equity in earnings (losses) of unconsolidated subsidiaries not included above		[4222]		
	a. After Federal income taxes of	[4238]			
20.	Extraordinary gains (losses)		[4224]		
	a. After Federal income taxes of	[4239]			
21.	Cumulative effect of changes in accounting principles		[4225]		
22.	Net income (loss) after Federal income taxes and extraordinary items		428 [4230]		
MONT	THLY INCOME				
23.	Income (current monthly only) before provision for Federal income taxes and extractitems	ordinary	-474 [4211]		

EXEMPTIVE PROVISIONS

25. If an exemption from Rule 15c3-3 is claimed, identify below the section upon which such exemption is based

A. (k)		[4550]
	nds and/or variable annuities only)	
B. (k)		[4560]
(2)(i)"Special Account for the E maintained	xclusive Benefit of customers"	
C. (k)		▽ [4570]
	cleared through another broker-dealer of clearing firm(s)	
Clearing Firm SEC#s	Name	Product Code
8- 45123	SOUTHWEST SECURITIES, INC.	All [4335B]
[4335A]	[4335A2]	
8-		[4335D]
[4335C]	[4335C2]	
8-		[4335F]
[4335E]	[4335E2]	
8-		[4335H]
[4335G]	[4335G2]	
8-		[4335J]
[43351]	[433512]	
-		T 145001
D. (k) (2) Exampled by arder of the Co	mmississ	¹ [4580]

COMPUTATION OF NET CAPITAL

securities:

1.	Total ow	nership equity from Stater	ment of Financial Cor	ndition	6,214 [3480]
2.	Deduct of	ownership equity not allow	able for Net Capital		[3490]
3.	Total ow	nership equity qualified fo	r Net Capital		6,214 [3500]
4.	Add:				
	Α.	Liabilities subordinated in computation of net of		ral creditors allowable	0 [3520]
	В.	Other (deductions) or a	illowable credits (Li	st)	
			[3525A]	[3525B]	
			[3525C]	[3525D]	_
			[3525E]	[3525F]	0 [3525]
5.	Total ca	pital and allowable subord	inated		6,214 [3530]
6.	Deduction	ons and/or charges:			
	Α.	Total nonallowable ass from Statement of Fina Condition (Notes B and	ncial	0 [3540]	
	В.	Secured demand note deficiency		[3590]	
	C.	Commodity futures cor and spot commodities proprietary capital cha		[3600]	
	D.	Other deductions and/charges	or	[3610]	0 [3620]
7.	Other ac	dditions and/or credits (Lis	t)		
			[3630A]	[3630B]	
			[3630C]	[3630D]	
			[3630E]	[3630F]	0 [3630]
8.	Net cap position	ital before haircuts on secus	urities		6,214 [3640]
9.		on securities (computed, ple. pursuant to 15c3-1(f)):	where		
	Α.	Contractual securities commitments		[3660]	
	В.	Subordinated securitie borrowings	s	[3670]	
	C.	Trading and investmen	nt		

1.	Exempted securities	[3735]	
2.	Debt securities	[3733]	
3.	Options	[3730]	
4.	Other securities	265 (3734)	
D. Undue (Concentration	[3650]	
E. Other (L	List)		
	[3736A]	[37368]	
	[3736C]	[3736D]	
	[3736E]	(3736F) 0 (3736)	-265 [3740]
. Net Capital		t the community of the contract of the contrac	5, 949 [3750]

COMPUTATION OF BASIC NET CAPITAL REQUIREMENT

Pa	rt	Δ
ГО	1 6	~

(List)

10.

11.	Minimum net capital required (6-2/3% of line 19)	<u>0</u> [3756]
12.	Minimum dollar net capital requirement of reporting broker or dealer and minimum net capital requirement of subsidiaries computed in accordance with Note(A)	5,000 [3758]
13.	Net capital requirement (greater of line 11 or 12)	5,000 [3760]
14.	Excess net capital (line 10 less 13)	9 <u>4</u> .9 [3770]
15.	Excess net capital at 1000% (line 10 less 10% of line 19)	5,949 [37 8 0]

COMPUTATION OF AGGREGATE INDEBTEDNESS

16.		l. liabilities from Statement of al Condition		0 [3790]
17.	Add:			
	Α.	Drafts for immediate credit	[3800]	
	В.	Market value of securities borrowed for which no equivalent value is paid or credited	[3810]	,
	C.	Other unrecorded amounts		

	[5020/1]		[30200]		
	[3820C]		[3820D]		
	[3820E]		[3820F]		
			; [3820]		0 [3830]
19.	Total aggregate indebtedness				(3840)
20.	Percentage of aggregate indebtedness to net capital (line 19 / line 10)			%	ි [3850]
organic automotive	The second secon		614 - 1 414 - 1 1 1 1 1 1 1 1 1 1 1 1 1 1	*****	A Commission of the Commission
		OTHER RATIOS			
21.	Percentage of debt to debt-equity total comwith Rule 15c3-1(d)	puted in accordance		%	0 [3860]

SCHEDULED WITHDRAWALS

Ownership Equity and Subordinated Liabilities maturing or proposed to be withdrawn within the next six months and accruals, (as defined below), which have not been deducted in the computation of Net Capital.

Type of Proposed Withdrawal or Accrual	Name of Leucer or Contributor		Insider or Outsider	Amount to be Withdrawr, (cash amount and/or Net Caphal Value of Securities)	Withdrawat or Mattinly Date (MMDDYYYY)	(1)
[4600]		[4601]	[4602]	[4603]	[4604]	[4605]
[4610]		[]	[]	[.500]	[100.1]	()
[4620]		[4611]	[4612]	[4613]	[4614]	[4615]
[4020]		[4621]	[4622]	[4623]	[4624]	[4625]
[4630]		[4631]	[4632]	[4633]	[4634]	[4635]
[4640]		[4001]	[4002]	(4000)	[4054]	[4000]
[4050]		[4641]	[4642]	[4643]	[4644]	[4645]
[4650]		[4651]	[4652]	[4653]	[4654]	[4655]
[4660]		[4661]	[4662]	[4663]	[4864]	[4665]
[4670]		[4001]	[4002]	[4000]	[4004]	[4000]
[4000]		[4671]	[4672]	[4673]	[4674]	[4675]
[4680]		[4681]	[4682]	[4683]	[4684]	[4685]
[4690]						
		[4691]	[4692]	[4693]	[4694]	[4695]
•			TOTAL \$	0		
				[4699]		
				Omit Pennies		

Instructions Detail listing must include the total of items maturing during the six month period following the report date, regardless of whether or not the capital contribution is expected to be renewed. The schedule must also include proposed capital withdrawals scheduled within the six month period following the report date including the proposed redemption of stock and payments of liabilities secured by fixed assets (which are considered allowable assets in the capital computation pursuant to Rule 15c3-1(c)(2)(iv)), which could be required by the lender on demand or in less than six months.

Withdrawai Code	Description
1	Equity Capital
2.	Subordinated Liabilities
3	Accruais
á.	15c3-1(c)(2)(iv) Liabilitie:

STATEMENT OF CHANGES

STATEMENT OF CHANGES IN OWNERSHIP EQUITY (SOLE PROPRIETORSHIP PARTNERSHIP OR CORPORATION)

year.	Balanca. A.	. beginning of period Net income (Icss)		5,784 [4240] 428 [4250]
	₿.	Additions (includes non-conforming capital of	[4262])	[4260]
	C.	Deductions (includes non-conforming capital of	[4272])	[4270]
2.	Balance	end of period (From item 1800)		6,212 [4290]
		STATEMENT OF CHANGES IN LIABILITY TO CLAIMS OF GENERAL CR		
3.	Balance	, beginning of period		[4300]
	A.	increases		[4310]
	8.	Decreases		[4320]
4.	Balance	, end of period (From item 3520)		0 [4330]

	Dec 31, 04
ASSETS	
Current Assets	
Checking/Savings	
11200-SSE CEF Money Market	837.29
11201-SWS Clearing Deposit	5,376.77
Total Checking/Savings	6,214.06
Total Current Assets	6,214.06
	,
TOTAL ASSETS	6,214.06
LIABILITIES & EQUITY	
Equity	
39004-Capital Stock	8,000.00
39005-Retained Earnings	-3,305.41
39006-Paid in Capital	7,000.00
Net Income	-5,480.53
Total Equity	6,214.06
TOTAL LIABILITIES & EQUITY	6,214.06

December 2004

	Dec 04	Jan - Dec 04
Ordinary Income/Expense		
Income		
40103-Income ASE Options	91.00	596.00
40106 - Other Options	1,060.00	11,853.27
40107-Income-Other Markets	37.20	17,688.20
40108-Income CBOE	0.00	16,945.98
40109-Income-OTC Stock	204.06	9,641.28
40112 - Mutual Funds	0.00	5.43
40114-Income-Other Exchanges	0.00	2,914.54
40120 - Income NYSE Options	0.00	532.59
40126-Income - Non Trades	0.00	553.05
40127 - Consulting Income	0.00	1,000.00
42000-Investment P/L	-10.20	-10.20
44000-Interest on Deposit	4.22	20.01
44001-Interest on Company A/C	0.39	1.88
44002 - Miscellaneous Income	0.00	165.00
44003 - Miscellaneous Income	100.00	100.00
44004 - Dividend Income	0.00	0.54
Total Income	1,486.67	62,007.57
Expense		
61600-Commissions Paid	650.00	41,705.00
61601-Broker Clearance Paid	929.25	20,671.94
63250 - Postage/Delivery	20.98	201.66
63300 - Broker Compliance	360.00	4,385.00
75200 - SIPC Expense	0.00	300.00
Total Expense	1,960.23	67,263.60
Net Ordinary Income	-473.56	-5,256.03
Other Income/Expense Other Expense		
63400 - G/L Investments	0.00	224.50
Total Other Expense	0.00	224.50
Net Other Income	0.00	-224.50
Net Income	-473.56	-5,480.53

02/07/05 Accrual Basis

October through December 2004

	Oct - Dec 04
Ordinary Income/Expense Income	
40103-Income ASE Options	91.00
40106 - Other Options	1,851.66
40107-Income-Other Markets	921.16
40108-Income CBOE	519.26
40109-Income-OTC Stock	596.17
40112 - Mutual Funds	5.43
40114-Income-Other Exchanges	116.27
40127 - Consulting Income	1,000.00
42000-Investment P/L	-10.20
44000-Interest on Deposit	7.26
44001-Interest on Company A/C	0.55
44003 - Miscellaneous Income	100.00
Total Income	
rotar income	5,198.56
Expense	
61600-Commissions Paid	1,350.00
61601-Broker Clearance Paid	2,102.04
63250 - Postage/Delivery	61.71
63300 - Broker Compliance	1,260.00
Total Expense	4,773.75
Net Ordinary Income	424.81
Net Income	424.81

02/07/05

January through December 2004

	Jan - Dec 04
OPERATING ACTIVITIES Net Income	-5,480.53
Net cash provided by Operating Activities	-5,480.53
FINANCING ACTIVITIES 39005-Retained Earnings Retained Earnings Net cash provided by Financing Activities	5,290.23 -5,290.23 0.00
Net cash increase for period	-5.480.53
Cash at beginning of period	11,694,59
Cash at end of period	6,214.06

	Dec 31, 04		
	Debit	Credit	
11200-SSE CEF Money Market	837.29		
11201-SWS Clearing Deposit	5,376.77		
11300 - Securities Owned	0.00		
11400 - Unrealized G/L	0.00		
39004-Capital Stock		8,000.00	
39005-Retained Earnings	3,305.41		
39006-Paid in Capital		7,000.00	
Retained Earnings	0.00		
40103-Income ASE Options		596.00	
40106 - Other Options	-	11,853.27	
40107-Income-Other Markets		17,688.20	
40108-Income CBOE		16,945.98	
40109-Income-OTC Stock		9,641.28	
40112 - Mutual Funds		5.43	
40114-Income-Other Exchanges		2,914.54	
40120 - Income NYSE Options		532.59	
40126-Income - Non Trades		553.05 1,000.00	
40127 - Consulting Income 42000-Investment P/L	10.20	1,000.00	
	10.20	20.01	
44000-Interest on Deposit 44001-Interest on Company A/C		1.88	
44002 - Miscellaneous Income		165.00	
44003 - Miscellaneous Income		100.00	
44004 - Dividend Income		0.54	
61600-Commissions Paid	41,705.00	0.01	
61601-Broker Clearance Paid	20,671.94		
63250 - Postage/Delivery	201.66		
63300 - Broker Compliance	4,385.00		
75200 - SIPC Expense	300.00		
63400 - G/L Investments	224.50		
TOTAL	77,017.77	77,017.77	

General Leager

Date	Name	Split	Amount	Balance
11200-SSE CEF Mo	ney Market			6.187.63
1/5/2004	NASD	44002 - Miscellan	165.00	6,352.63
1/14/2004	Southwest Securities	-SPLIT-	0.00	6.352.63
1/14/2004	Southwest Securities	11200-SSE CEF	0.00	6.352.63
1/14/2004	Southwest Securities	11200-SSE CEF	0.00	6,352.63
1/14/2004	Southwest Securities	-SPLIT-	-1.123.50	5,229.13
1/15/2004 1/18/2004	Southwest Securities Jurgen Dodgin	-SPLIT- 61600-Commissi	-1.399.00 -5.000.00	3,830.13 -1,169.87
1/27/2004	Southwest Securities	40109-Income-O	7,008.56	5,838.69
1/27/2004	Southwest Securities	40126-Income	-971.40	4.867.29
1/30/2004	Southwest Securities	44001-Interest on	0.36	4.867.65
1/31/2004	Southwest Securities	61601-Broker Cle	860.06	5,727.71
1/31/2004	Southwest Securities	63400 - G/L Inves	-224.50	5,503.21
1/31/2004	Southwest Securities	11300 - Securitie	3,022.50	8,525.71
2/5/2004 2/6/2004	Jurgen Dodgin SIPC	61600-Commissi 75200 - SIPC Exp	-7,500.00 -150.00	1,025.71 875.71
2/24/2004	Southwest Securities	40109-Income-O	2,965.63	3,841.34
2/24/2004	Southwest Securities	40126-Income	-264.63	3,576,71
2/27/2004	Southwest Securities	44001-Interest on	0.25	3,576.96
3/8/2004	Jurgen Dodgin	61600-Commissi	-1,500.00	2,076.96
3/10/2004	Jurgen Dodgin	61600-Commissi	-1,600.00	476.96
3/22/2004	Jurgen Dodgin	61600-Commissi	-100.00	376.96
3/23/2004	Southwest Securities	40109-Income-O	2,597.03	2,973.99
3/23/2004	Southwest Securities Southwest Securities	40126-Income	-293.85 0.22	2,680.14
3/31/2004 4/2/2004	Jurgen Dodgin	44004 - Dividend 61600-Commissi	-2,400.00	2,680.36 280.36
4/15/2004	Southwest Securities	61600-Commissi	-15.00	265.36
4/19/2004	SIPC	75200 - SIPC Exp	-150.00	115.36
4/23/2004		61600-Commissi	0.00	115.36
4/27/2004	Southwest Securities	40109-Income-O	6,559.24	6,674.60
4/27/2004	Southwest Securities	40126-Income	-3,026.05	3,648.55
4/27/2004	Southwest Securities	61601-Broker Cle	270.75	3,919.30
4/30/2004	Southwest Securities	44004 - Dividend	0.10	3,919.40
5/5/2004 5/6/2004	Jurgen Dodgin Jurgen Dodgin	61600-Commissi 61600-Commissi	-2,500.00 -1,300.00	1,419.40 119.40
5/25/2004	Southwest Securities	40109-Income-O	7,325.82	7,445.22
5/25/2004	Southwest Securities	40126-Income	-635.91	6,809.31
5/25/2004	Southwest Securities	61601-Broker Cle	266.80	7,076.11
5/28/2004	Southwest Securities	44000-Interest on	0.20	7,076.31
6/2/2004	Southwest Securities	61600-Commissi	-6,500.00	576.31
6/23/2004	Southwest Securities Southwest Securities	40109-Income-O 63300 - Broker C	3,935.59 -319.94	4,511.90 4,191.96
6/23/2004 6/30/2004	Southwest Securities Southwest Securities	44001-Interest on	0.21	4,192.17
7/2/2004	Jurgen Dodgin	61600-Commissi	-720.00	3,472.17
7/7/2004	Jurgen Dodgin	61600-Commissi	-3,000.00	472.17
7/27/2004	Southwest Securities	40109-Income-O	3,906.07	4,378.24
7/27/2004	Southwest Securities	63300 - Broker C	-320.03	4,058.21
7/30/2004	Southwest Securities	44001-Interest on	0.35	4,058.56
8/1/2004	Jurgen Dodgin	61600-Commissi	-3,700.00	358.56
8/24/2004	Southwest Securities	40109-Income-O	1,677.30 -320.03	2,035.86 1,715.83
8/24/2004 8/31/2004	Southwest Securities Southwest Securities	63300 - Broker C 44004 - Dividend	0.22	1,716.05
9/1/2004	Jurgen Dodgin	61600-Commissi	-1.500.00	216.05
9/21/2004	Southwest Securities	40109-Income-O	573.85	789.90
9/21/2004	Federal Exp	63250 - Postage/	-20.32	769.58
9/21/2004	Southwest Securities	44001-Interest on	0.16	769.74
10/1/2004	Jurgen Dodgin	61600-Commissi	-700.00	69.74
10/26/2004	Southwest Securities	40109-Income-O	524.36	594.10
10/29/2004	Southwest Securities	44001-Interest on	0.04	594.14
10/29/2004 10/29/2004	Jurgen Dodgin Broker Compliance	40127 - Consultin 63300 - Broker C	1.000.00 -600.00	1,594,14 994,14
10/31/2004	Federal Exp	63250 - Broker C 63250 - Postage/	-40.73	953.41
11/22/2004	Southwest Securities	40109-Income-O	1,011.54	1,964.95
11/22/2004	Broker Compliance	63300 - Broker C	-300.00	1,664.95
11/30/2004	Southwest Securities	44001-Interest on	0.12	1,665.07
11/30/2004	Southwest Securities	11201-SWS Clea	-1,000.00	665,07
12/17/2004	Southwest Securities	11200-SSE CEF	-1.100.20	-435.13
12/17/2004	Southwest Securities	11200-SSE CEF	1.100.20	665.07

Date	Name	Split	Amount	Balance
12/21/2004 12/21/2004 12/21/2004 12/28/2004 12/28/2004 12/28/2004 12/30/2004 12/31/2004	Jurgen Dodgin Southwest Securities Jurgen Dodgin Southwest Securities Broker Compliance Federal Exp Southwest Securities Jurgen Dodgin	61600-Commissi 44001-Interest on 11201-SWS Clea 40109-Income-O 63300 - Broker C 63250 - Postage/ 42000-Investmen 44003 - Miscellan	-650.00 0.39 650.00 463.01 -360.00 -20.98 -10.20 100.00	15.07 15.46 665.46 1,128.47 768.47 747.49 737.29 837.29
Total 11200-SSE CE	F Money Market		-5,350.34	837.29
11201-SWS Clearin 1/30/2004 1/31/2004 2/29/2004 3/31/2004 4/30/2004 5/28/2004 6/30/2004 7/30/2004 8/31/2004 9/30/2004 10/29/2004 11/30/2004	Southwest Securities Jurgen Dodgin	44000-Interest on 11200-SSE CEF	3.38 0.64 0.59 0.64 0.62 0.62 1.22 1.84 2.36 3.04 1,000.00 -650.00	5,006.96 5,010.34 5,010.98 5,011.57 5,012.21 5,012.83 5,013.47 5,014.09 5,015.31 5,017.15 5,019.51 5,022.55 6,022.55 5,372.55
12/31/2004	Southwest Securities	44000-Interest on	4.22 369.81	5,376.77 5,376.77
Total 11201-SWS C 11300 - Securities (1/14/2004 1/14/2004		11200-SSE CEF 11200-SSE CEF	0.00 335.50	5,576.77 500.00 500.00 835.50
1/14/2004 1/14/2004 1/15/2004 1/15/2004 1/31/2004	Southwest Securities Southwest Securities Southwest Securities Southwest Securities Southwest Securities Southwest Securities	11200-SSE CEF 11200-SSE CEF 11200-SSE CEF 11200-SSE CEF 11200-SSE CEF	452.50 335.50 594.50 804.50 -3,022.50	1,288.00 1,623.50 2,218.00 3,022.50 0.00
Total 11300 - Securi	ties Owned		-500.00	0.00
11400 - Unrealized	G/L			0.00
Total 11400 - Unrea	lized G/L			0.00
39004-Capital Stoc	k			-8,000.00
Total 39004-Capital	Stock			-8,000.00
39005-Retained Ea 7/1/2004 Total 39005-Retaine	Doding	Retained Earnings	-5.290.23 -5.290.23	8,595.64 3,305.41 3,305.41
39006-Paid in Capi			,	-7,000.00
Total 39006-Paid in				-7,000.00
Opening Bal Equity	·			0.00
Total Opening Bal E				0.00
Retained Earnings				-5,290.23
Total Retained Earn	ings		5,290.23	0.00
40101- Income NYS	SE Stocks			0.00
Total 40101- Income	e NYSE Stocks			0.00
40103-Income ASE 1/27/2004 2/24/2004 3/23/2004 5/25/2004	Options Southwest Securities Southwest Securities Southwest Securities Southwest Securities	40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O	-156.00 -47.00 -220.00 -82.00	0.00 -156.00 -203.00 -423.00 -505.00

Date	Name	Split	Amount	Balance
12/28/2004	Southwest Securities	40109-Income-O	-91.00	-596.00
Total 40103-Incom	e ASE Options		-596.00	-596.00
40104 - Income Ma	argin Interest			0.00
Total 40104 - Incon	ne Margin Interest			0.00
40106 - Other Opti 1/27/2004 2/24/2004 3/23/2004 4/27/2004 5/25/2004 6/23/2004 7/27/2004 8/24/2004	Southwest Securities	40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O	-1,998.84 -1,688.89 -1,480.66 -407.77 -1,837.16 -829.30 -887.50 -733.49	0.00 -1.998.84 -3.687.73 -5,168.39 -5,576.16 -7.413.32 -8,242.62 -9,130.12 -9.863.61
9/21/2004 10/26/2004 11/22/2004 12/28/2004	Southwest Securities Southwest Securities Southwest Securities Southwest Securities	40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O	-138.00 -351.00 -440.66 -1,060.00	-10,001.61 -10.352.61 -10,793.27 -11,853.27
Total 40106 - Other	r Options		-11,853.27	-11.853.27
40107-Income-Oth 1/27/2004 2/24/2004 3/23/2004 4/27/2004 5/25/2004 6/23/2004 7/27/2004 9/21/2004 10/26/2004 11/22/2004 12/28/2004	ner Markets Southwest Securities	40109-Income-O	-2,406.30 -566.94 -1,323.51 -3,315.48 -5,047.41 -2,252.51 -1,715.48 -139.41 -162.09 -721.87 -37.20	0.00 -2,406.30 -2,973.24 -4,296.75 -7,612.23 -12,659.64 -14,912.15 -16,627.63 -16,767.04 -16,929.13 -17,651.00 -17,688.20
Total 40107-Incom	e-Other Markets		-17,688.20	-17,688.20
40108-Income CB 1/27/2004 2/24/2004 3/23/2004 4/27/2004 5/25/2004 6/23/2004 7/27/2004 8/24/2004 9/21/2004 10/26/2004 11/22/2004	Southwest Securities	40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O	-7,097.99 -701.78 -771.05 -2,084.52 -1,713.45 -1,331.18 -447.15 -1,726.38 -553.22 -62.00 -457.26	0.00 -7,097.99 -7,799.77 -8,570.82 -10,655.34 -12,368.79 -13,699.97 -14,147.12 -15,873.50 -16,426.72 -16,488.72 -16,945.98
Total 40108-Incom	e CBOE		-16,945.98	-16,945.98
40109-Income-OT 1/27/2004 2/24/2004 3/23/2004 4/27/2004 5/25/2004 6/23/2004 7/27/2004 8/24/2004 9/21/2004 10/26/2004 11/22/2004 12/28/2004 Total 40109-Incom	Southwest Securities	-SPLIT- -SPLIT- -SPLIT- -SPLIT- -SPLIT- -SPLIT- -SPLIT- -SPLIT- -SPLIT- -SPLIT- -SPLIT-	-315.01 -1,377.43 -594.23 -2,767.61 -1,113.80 -685.57 -1,432.31 -638.43 -120.72 -312.11 -80.00 -204.06	0.00 -315.01 -1.692.44 -2.286.67 -5.054.28 -6.168.08 -6.853.65 -8.285.96 -8.924.39 -9.045.11 -9.357.22 -9.437.22 -9.641.28
			-9,041.20	
40112 - Mutual Fu 10/26/2004	Southwest Securities	40109-Income-O	-5.43	0.00 -5.43

Ochera Ecager

Date	Name	Split	Amount	Balance
Total 40112 - Mutual	Funds	-5.43	-5.43	
40114-Income-Othe 1/27/2004 3/23/2004 4/27/2004 6/23/2004 7/27/2004 10/26/2004	r Exchanges Southwest Securities Southwest Securities Southwest Securities Southwest Securities Southwest Securities Southwest Securities	40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O 40109-Income-O	-630.17 -301.83 -691.36 -430.78 -744.13 -116.27	0.00 -630.17 -932.00 -1.623.36 -2.054.14 -2,798.27 -2,914.54
Total 40114-Income-	Other Exchanges		-2,914.54	-2,914.54
40120 - Income NYS 2/24/2004 6/23/2004 Total 40120 - Income	Southwest Securities Southwest Securities	40109-Income-O 40109-Income-O	-488.59 -44.00	0.00 -488.59 -532.59
			-532.59	-532.59
40125 - All other Co				0.00
Total 40125 - All other 40126-Income - Non 1/27/2004 1/27/2004 2/24/2004 3/23/2004 4/27/2004 5/25/2004	Trades Southwest Securities	40109-Income-OSPLITSPLITSPLITSPLIT- 40109-Income-O	-138.00 -67.14 -54.09 -35.90 -23.83 -200.00	0.00 0.00 -138.00 -205.14 -259.23 -295.13 -318.96 -518.96
5/25/2004 Total 40126-Income -	Southwest Securities - Non Trades	-SPLIT-	-34.09 -553.05	-553.05 -553.05
40127 - Consulting I 10/29/2004 Total 40127 - Consul	Jurgen Dodgin	11200-SSE CEF	-1,000.00 -1,000.00	0.00 -1,000.00 -1,000.00
42000-Investment P 12/30/2004 Total 42000-Investme	Southwest Securities	11200-SSE CEF	10.20 10.20	0.00 10.20 10.20
44000-Interest on De 1/30/2004 1/31/2004 2/29/2004 3/31/2004 4/30/2004 5/28/2004 6/30/2004 6/30/2004 7/30/2004 8/31/2004 9/30/2004 10/29/2004 12/31/2004	Southwest Securities	11201-SWS Clea	-3.38 -0.64 -0.59 -0.64 -0.62 -0.64 -0.20 -0.62 -1.22 -1.84 -2.36 -3.04 -4.22	0.00 -3.38 -4.02 -4.61 -5.25 -5.87 -6.51 -6.71 -7.33 -8.55 -10.39 -12.75 -15.79 -20.01
Total 44000-Interest			-20.01	-20.01
44001-Interest on Co 1/30/2004 2/27/2004 6/30/2004 7/30/2004 9/21/2004 10/29/2004 11/30/2004 12/21/2004 Total 44001-Interest of	Southwest Securities	11200-SSE CEF	-0.36 -0.25 -0.21 -0.35 -0.16 -0.04 -0.12 -0.39	0.00 -0.36 -0.61 -0.82 -1.17 -1.33 -1.37 -1.49 -1.88

Ocheral Leager

Date	Name	Split	Amount	Balance
44002 - Miscellane	ous Income			0.00
1/5/2004	NASD	11200-SSE CEF	-165.00	-165.00
Total 44002 - Misce	llaneous Income		-165.00	-165.00
44003 - Miscellane	ous Income			0.00
12/31/2004	Jurgen Dodgin	11200-SSE CEF	-100.00	-100.00
Total 44003 - Misce	llaneous Income		-100.00	-100.00
44004 - Dividend Ir	ncome			0.00
3/31/2004	Southwest Securities	11200-SSE CEF	-0.22	-0.22
4/30/2004	Southwest Securities	11200-SSE CEF	-0.10	-0.32 -0.54
8/31/2004 Total 44004 - Divide	Southwest Securities	11200-SSE CEF	-0.22 -0.54	-0.54
61600-Commission			0.04	0.00
1/18/2004	Jurgen Dodgin	11200-SSE CEF	5,000.00	5,000.00
2/5/2004	Jurgen Dodgin	11200-SSE CEF	7,500.00	12,500.00
3/8/2004	Jurgen Dodgin	11200-SSE CEF	1,500.00	14,000.00
3/10/2004	Jurgen Dodgin Jurgen Dodgin	11200-SSE CEF	1,600.00 100.00	15,600.00 15,700.00
3/22/2004 4/2/2004	Jurgen Dodgin	11200-SSE CEF 11200-SSE CEF	2.400.00	18,100.00
4/15/2004	Southwest Securities	11200-SSE CEF	15.00	18,115.00
4/23/2004		11200-SSE CEF	0.00	18,115.00
4/27/2004	Jurgen Dodgin	40126-Income	3,000.00	21,115.00
5/5/2004	Jurgen Dodgin Jurgen Dodgin	11200-SSE CEF	2,500.00 1,300.00	23,615.00 24,915.00
5/6/2004 5/25/2004	Southwest Securities	11200-SSE CEF 40126-Income	20.00	24,935.00
6/2/2004	Southwest Securities	11200-SSE CEF	6,500.00	31,435.00
7/2/2004	Jurgen Dodgin	11200-SSE CEF	720.00	32,155.00
7/7/2004	Jurgen Dodgin	11200-SSE CEF	3,000.00	35,155.00
8/1/2004 9/1/2004	Jurgen Dodgin	11200-SSE CEF 11200-SSE CEF	3,700.00 1,500.00	38,855.00 40,355.00
10/1/2004	Jurgen Dodgin Jurgen Dodgin	11200-SSE CEF	700.00	41,055.00
12/21/2004	Jurgen Dodgin	11200-SSE CEF	650.00	41,705.00
Total 61600-Commi	issions Paid		41,705.00	41,705.00
61601-Broker Clea				0.00
1/27/2004	Southwest Securities	40109-Income-O	5,733.75	5,733.75
1/27/2004 1/27/2004	Southwest Securities Southwest Securities	40126-Income 40126-Income	35.00 10.00	5,768.75 5,778.75
1/27/2004	Southwest Securities	40126-Income	18.54	5,797.29
1/31/2004	Southwest Securities	11200-SSE CEF	-860.06	4.937.23
2/24/2004	Southwest Securities	40109-Income-O	1,905.00	6,842.23
2/24/2004	Southwest Securities	40126-Income	18.72	6,860.95
3/23/2004 3/23/2004	Southwest Securities Southwest Securities	40109-Income-O 40126-Income	2,094.25 10.00	8,955.20 8.965.20
4/27/2004	Southwest Securities	40109-income-O	2,707.50	11,672.70
4/27/2004	Southwest Securities	40126-Income	10.00	11,682.70
4/27/2004	Southwest Securities	11200-SSE CEF	-270.75	11,411.95
5/25/2004	Southwest Securities	40109-Income-O	2,668.00 -266.80	14,079.95 13,813.15
5/25/2004 6/23/2004	Southwest Securities Southwest Securities	11200-SSE CEF 40109-Income-Q	1.637.75	15.450.90
7/27/2004	Southwest Securities	40109-Income-O	1.320.50	16,771.40
8/24/2004	Southwest Securities	40109-Income-O	1.421.00	18,192.40
9/21/2004	Southwest Securities	40109-Income-O	377.50	18,569.90
10/26/2004	Southwest Securities Southwest Securities	40109-Income-O 40109-Income-O	484.54 688.25	19.054.44 19.742.69
11/22/2004 12/28/2004	Southwest Securities	40109-Income-O	929.25	20,671.94
Total 61601-Broker	Clearance Paid		20.671.94	20.671.94
63200-Interest Exp	pense			0.00
Total 63200-Interes	t Expense			0.00
63250 - Postage/D	elivery			0.00
3/23/2004	Southwest Securities	40126-Income	19.75	19.75
4/27/2004	Southwest Securities	40126-Income	39.88	59.63

Date	Name	Split	Amount	Balance
6/23/2004 7/27/2004 8/24/2004 9/21/2004 10/31/2004 12/28/2004	Federal Exp Federal Exp Federal Exp Federal Exp Federal Exp Federal Exp	63300 - Broker C 63300 - Broker C 63300 - Broker C 11200-SSE CEF 11200-SSE CEF 11200-SSE CEF	19.94 20.03 20.03 20.32 40.73 20.98	79.57 99.60 119.63 139.95 180.68 201.66
Total 63250 - Postag	e/Delivery		201.66	201.66
63300 - Broker Com 1/27/2004 1/27/2004 2/24/2004 3/23/2004 5/25/2004 6/23/2004 7/27/2004 8/24/2004 10/29/2004	Broker Compliance Southwest Securities Southwest Securities Broker Compliance Broker Compliance Broker Compliance Broker Compliance Broker Compliance Broker Compliance	40126-Income 40126-Income 40126-Income 40126-Income 40126-IncomeSPLITSPLIT- 11200-SSE CEF	675.00 300.00 300.00 300.00 650.00 300.00 300.00 600.00	0.00 675.00 975.00 1,275.00 1,575.00 2,225.00 2,525.00 2,825.00 3,125.00 3,725.00 4,025.00
11/22/2004 12/28/2004	Broker Compliance Broker Compliance	11200-SSE CEF 11200-SSE CEF	360.00	4,385.00
Total 63300 - Broker	Compliance		4,385.00	4,385.00
75000 - NASD Mem	bership			0.00
Total 75000 - NASD	Membership			0.00
75100 - NASD Rene	wals			0.00
Total 75100,- NASD	Renewals			0.00
75200 - SIPC Exper 2/6/2004 4/19/2004	ise SIPC SIPC	11200-SSE CEF 11200-SSE CEF	150.00 150.00	0.00 150.00 300.00
Total 75200 - SIPC 8	Expense		300.00	300.00
75300-Foreign With	holding Exp			0.00
Total 75300-Foreign	Withholding Exp			0.00
63400 - G/L investm 1/31/2004	nents Southwest Securities	 11200-SSE CEF	224.50	0.00 224.50
Total 63400 - G/L Inv	vestments		224.50	224.50
No accnt				0.00
Total no accnt				0.00
TOTAL		_	0.00	0.00

DIPL.-OEC. REINHARD BÜHLER

Wirtschaftsprüfer und Steuerberater

Dipl.-Oec. Reinhard Bühler · Landstraße 74 · 41569 Rommerskirchen

Doding & Partners Brokerage Inc. Weissdornweg 35

50259 Pulheim

Landstraße 74 41569 Rommerskirchen

Telefon 02183/6722

den

18.02.05

Unsere Zeichen

B/Kr

Independent Auditors' Report

Board of Directors
Doding & Partners Brokerage, Inc.

I have audited the accompanying statement of financial condition of Doding & Partners, Inc., as of December 31, 2004 and the related statements of income (loss), changes in ownership equity and cash flows for the year then ended. These financial statements are the responsibility of the Company's management. My responsibility is to express an opinion on these financial statements based on my audit.

I conducted my audit in accordance with generally accepted auditing standards. Those standards require that I plan and perform the audit to obtain reasonable assurance about wether the financial statements are free of material misstatement. An audit includes examining, on a text basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. I believe that my audit provides a reasonable basis for my opinion.

DIPL.-OEC. REINHARD BÜHLER · WIRTSCHAFTSPRÜFER

In my opinion, the financial statements referred to above present fairly, in all material aspects, the financial position of Doding & Partners Brokerage, Inc. as of December 31, 2004 and the results of their operations and their cash flows for the year then ended in conformity with generally accepted accounting principles.

My audit was made for the purpose of forming an opinion on the basic financial statements taken as a whole. The information contained in the schedules computation of net capital, computation of basic net capital requirement, computation for determination of reserve requirements for broker dealers under Rule 15 c 3 - 3, ownership equity, and reconciliation of the computation of net capital under Rule 15 c 3-1 and computation for determination of the reserve requirements under Exhibit A of Rule 15 c 3-3 at December 31, 2004 is presented for purposes of additional analysis and is not a required part of the basic financial statements, but is supplementary information required by Rule 17 a-5 of the Securities and Exchange Commission. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in my opinion, is fairly stated in all material respects in relation to the basic financial statements taken as a whole.

Rommerskirchen, February 18, 2005

Wirtschaftsprüfer

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INDEPENDENT AUDITORS' REPORT INTERNAL CONTROL STRUCTURE

In planning and performing my audit of the financial statements of Doding & Partners Brokerage, Inc. for the year ended December 31, 2004 (on which I have issued the report dated February 18, 2005), I considered its internal control structure in order to determine our auditing procedures for the purpose of expressing my opinion on the financial statements and not to provide assurance on the internal control structure.

Also, as required by Rule 17 a-5 (q) (1) of the Securities and Exchange Commission (the Commission), I have made a study of the practices and procedures (including tests of compliance with such practices and procedures) followed by Doding & Partners, Inc. that I considered relevant to the objectives stated in Rule 17 a-5 (g) in making the periodic computations of aggregate indebtedness and net capital under Rule 17 a-3 (a) (11) and for determining compliance with the exemptive provisions of Rule 15 c 3-3. I did not review the practices and procedures followed by the Company in making the quarterly securities examinations, accounts, verifications, and the recordation of differences required by Rule 17 a-13 or in complying with the requirements for prompt payment for securities under Section 8 of Regulation T of the Board of Governors of the Federal Reserve System, because the Company does not carry security accounts for customers or perform custodial functions relating to customer securities.

The management of the Company is responsible for establishing and maintaining an internal control structure and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgements by management are required to assess the expected benefits and related costs of internal control structure policies and procedures and of the practices and procedures referred to in the preceding paragraph and to assess wether those practices and procedures can be expected to achieve the Commission's above-mentioned objectives. Two of the objectives of an internal control structure and the practices and procedures are to provide management with reasonable, but not absolute assurance that assets for which the Company has responsibility are safeguarded against loss from unauthorized use or disposition and that transactions are executed in accordance with management's authorization and recorded properly to permit preparation of financial statements in conformity with generally accepted accounting principles.

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Rule 17 a-5 (g) lists additional objectives of the practices and procedures listed in the preceding paragraph.

Because of inherent limitations in any internal control structure or in the practices and procedures referred to above, errors or irregularities may occur and not be detected. Also, projection of any evaluation of them to future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

My consideration of the internal control structure would not necessarily disclose all matters in the internal control structure that might be material weaknesses under standards established by the American Institute of Certified Public Accountants. A material weakness is a condition in which the design or operation of the specific internal control structure elements does not reduce to a relatively low level the risk that errors or irregularities, in amounts that would be material in relation to the financial statements being audited, may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. However, I noted no matters involving the internal control structure that I considered to be material weaknesses as defined above.

I understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the Commission to be adequate for its purposes in accordance with the Securities Exchange Act of 1934 and related regulations and that practices and procedures that do not accomplish such objectives in all material aspects indicate a material inadequacy for such purpose. Based on this understanding and on our study, I believe that the Company's practices and procedures were adequate at December 31, 2004, to meet the Commission's objectives.

This report is intended solely for the use of management and the Securities and Exchange Commission and other regulatory agencies that rely on Rule 17 a-5 (g) under the Securities Exchange Act of 1934 in their regulation of registered brokers and dealers and should not be used for any other purpose.

<u>DIPL.-DEC. REINHARD BUHLER WIRTSCHAFTSPRUFER</u>

Doding & Partners Brokerage, Inc. Notes to Financial Statements December 31, 2004

Note 1 - Summary of Significant Accounting Policies

The Company is a broker-dealer in securities registered with the Securities and Exchange Commission under (S.E.C.) Rule 15 c 3-3 (k) (2) (ii) which provides that all the funds and securities belonging to the Company's customers are to be handled by a correspondent broker-dealer.

Commission revenue and expense are recorded on a settlement date basis, generally the fifth business day following the transaction. If materially different, commission income and expenses are recorded on a trade date basis.

Depreciation is provided for using an accelerated method over a period of five to seven years.

Note 2 - Net Capital Requirements

Pursuant to the net capital provisions of Rule 15 c 3-1 of the Securities Exchange Act of 1934, the Company is required to maintain a minimum net capital, as defined under such provisions. Net capital and the related net capital ratio may fluctuate on a daily basis. At December 31, 2004, the Company had net capital of approximately \$ 6.214,--.

Note 3 - Possession or Control Requirements

There were no material inadequacies found to exist in the procedures followed in adhering to the exemptive provisions of (S.E.C.) Rule 15 c 3-3 (K) (2) (ii) by promptly transmitting all customer funds and securities to the correspondent broker who carries the customer accounts; therefore, the Company does not to have any possession or control of customer funds or securities.

Supplemental Information

Pursuant to Rule 17 a-5 of the

Securities Exchange Act of 1934

For the year January 1, 2004

to December 31, 2004